

Rumrill, Nancy

From: Joan Werner (b)(6)/Privacy Act
Sent: Tuesday, February 27, 2018 4:32 PM
To: Rumrill, Nancy
Subject: RE: Supplemental comments regarding Gunnison Copper Project Class III Draft Underground Injection Control Permit

Dear Ms. Rumrill,

This comment is about the Draft Class III Underground Injection Control Permit (UIC) for Excelsior Mining's Gunnison Copper Project located in Cochise County, Arizona.

I am very concerned because Arizona is currently experiencing a severe drought with no signs of abatement and every drop of groundwater is precious. The EPA needs to exercise extreme caution in permitting any activity with the potential of contaminating groundwater especially since this project would use an untested technology for copper production and is proposed by a new mining company that has never attempted this type of mining.

I have grave concerns about the granting of an Aquifer exemption for this project. If EPA grants this exemption, a current and future source of drinking water would be permanently compromised.

Due to the lack of explanation as to the origin of EPA's interpretation of critical regulatory terms, the lack of a cumulative impacts analysis as required, and the issues raised in my and others' comments, the draft UIC package is incomplete. A revised/supplemental draft UIC permit must be completed and re-noticed for at least a 90-day public comment period. Please keep me informed of any further actions regarding this matter.

Sincerely,

Ms. Joan Werner
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